

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

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IN RE:

Reagor-Dykes Motors, LP,  
Reagor-Dykes Imports, LP,  
Reagor-Dykes Amarillo, LP,  
Reagor-Dykes Auto Company, LP,  
Reagor-Dykes Plainview, LP, and  
Reagor-Dykes Floydada, LP,  
Reagor Auto Mall, Ltd.,  
Reagor-Dykes Snyder, L.P.,  
Reagor-Dykes Auto Mall I LLC,  
Reagor-Dykes II LLC,  
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11  
Jointly Administered

Debtors,

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Dennis Faulkner, Creditors' Trustee,

*Plaintiff,*

Adversary No. 20-05005-rlj

vs.

Ford Motor Credit Company LLC,

*Defendant.*

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**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S  
MOTION FOR SUMMARY JUDGMENT**

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Defendant Ford Motor Credit Company LLC ("Ford Credit") hereby files its Motion for Summary Judgment, and moves for summary judgment against Plaintiff Creditors' Trustee Dennis Faulkner ("Trustee"). As a matter of law, Ford Credit is entitled to summary

judgment on the Trustee's fraudulent transfer and preferential claims. In the alternative, Ford Credit is entitled, as a matter of law, to limit the Trustee's recovery (if any) against Ford Credit to the amount of the total remaining priority, administrative, and allowed, non-subordinated unsecured creditor claims against the Debtors (excluding Ford Credit's own unsecured claim), and any recovery should be further limited to the "net harm" to the estate resulting from the challenged transfers. Ford Credit's Motion for Summary Judgment should be granted in its entirety for the reasons set forth in Ford Credit's Brief in Support of Motion for Summary Judgment.

1. Ford Credit relies on the evidence included in its Appendix in Support of Motion for Summary Judgment. Ford Credit also relies on all docket entries cited in its Brief in Support of Motion for Summary Judgment.

2. Pursuant to Local Bankruptcy Rule 7056-1(c)(2), each of the requirements of Local Bankruptcy Rule 7056-1(c)(1) will be set forth in Ford Credit's Brief in Support of Motion for Summary Judgment.

3. Ford Credit respectfully requests a hearing on its Motion for Summary Judgment.

#### **PRAYER**

Ford Credit requests that the Court grant its Motion for Summary Judgment in its entirety. Ford Credit also requests such other and further relief to which it may be justly entitled.

Dated: March 14, 2022

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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*ATTORNEYS FOR DEFENDANT  
FORD MOTOR CREDIT COMPANY LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2022, a copy of the foregoing Brief was filed electronically. Notice of this filing will be sent to all parties through the Court's Electronic Case Filing System ("ECF"). Parties may access this filing through ECF.

/s/ Kevin M. Sadler

Kevin M. Sadler